

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION**

UNITED STATES OF AMERICA,

**Plaintiff,**

**VS.**

**Civil No. 99-63-DRH**

**MONSANTO CHEMICAL COMPANY, et al.,**

**Defendants.**

**MONSANTO COMPANY and SOLUTIA INC., )**

**Counterclaim Plaintiffs,**

**VS.**

**UNITED STATES OF AMERICA, et al.,**

**Counterclaim Defendants.**

**AMERICAN ZINC COMPANY'S RESPONSE TO SOLUTIA INC.'S FIRST SET  
OF INTERROGATORIES DIRECTED TO  
COUNTERCLAIM DEFENDANT AMERICAN ZINC COMPANY**

Comes Now Counterclaim Defendant American Zinc Company and hereby responds to Solutia Inc.'s First Set of Interrogatories Directed to Counterclaim Defendant American Zinc Company. In providing these responses, Defendant is referenced to Counterclaim Defendant American Zinc Company's Objections to Solutia, Inc. First Set of Interrogatories Directed to Counterclaim Defendant American Zinc Company which are incorporated by reference.

## INTERROGATORIES

1. Identify all of your past and present employees that have knowledge or information about the generation, transportation, treatment, disposal or other handling of Hazardous Substances at your Facility or at the Sites.

**ANSWER:** Defendant has produced documents in response to Defendant Solutia, Inc.'s First Request for Production of Documents which identify individuals who provided services at Defendant's facility in Sauget, Illinois to which Defendant is referred. Defendant lacks sufficient knowledge and information to identify which of the employees identified have knowledge or information regarding hazardous substances.

2. Identify all persons who have at any time held an ownership, leasehold, or easement interest in your Property and, for each such person, describe the nature of their interest and state the dates between which they held such interest. Include in this listing the person or persons from whom you acquired your Property.

**ANSWER:** Defendant has produced agreements with the United States pertaining to production of materials at Defendant's Facility in Sauget, Illinois. In addition, Defendant has produced its agreement by which it sold its interest in the Facility to the Amax Zinc Company. Defendant acquired the Facility from the Evans-Wallower Zinc Company. Defendant will produce the documents regarding the acquisition if they can be located.

3. Describe the corporate structure of American Zinc, including its officers and share holders, state of incorporation, dates of operation and its current status. If the company no longer

exists, explain how the company was taken out of existence and where the assets were distributed.

**ANSWER:** American Zinc Company no longer exists. Please see answer to Interrogatory #4.

4. Describe the corporate history of American Zinc, listing all mergers, sales, corporate restructuring and changes in ownership.

**ANSWER:** American Zinc Lead and Smelting Company was formed in 1899. In 1966, American Zinc Lead and Smelting Company and its subsidiaries merged to form American Zinc Company. In 1972, the name of the company was changed to Azcon Co. In 1983, Azcon Co. changed its name to Gold Fields American Industries, Inc. Finally, in 1985, Gold Fields American Industries, Inc. merged with a new entity to become Blue Tee Corp., a Maine corporation.

5. Describe in detail all past and present operations conducted at your Facility.

**ANSWER:** Defendant operated an electrolytic zinc plant at its facility to produce high-grade slab zinc. Defendant has produced documents in response to Defendant Solutia, Inc.'s First Request for Production of Documents which contain information responsive to this Interrogatory to which Defendant is referred.